

EXHIBIT 11

From: [Chelsea J. Crawford](#)
To: [James Fields](#)
Cc: [Andrew D. Freeman](#); [Bill Sinclair](#); [Neel Lalchandani](#)
Subject: RE: Umar Burley, et al. v. BPD - Discovery Requests (Word versions)
Date: Wednesday, January 22, 2020 5:05:00 PM

Hi James,

We will grant you the two additional days to provide your clients' discovery responses. However, there will be no further extensions, and any objections you have will be waived if we do not receive the responses on Friday. We are also prepared to file a motion to compel if you miss the Friday deadline.

Please reach out if you have any questions.

Thank you,

Chelsea J. Crawford

Attorney

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From: James Fields [mailto:jfields@fieldspeterson.com]
Sent: Wednesday, January 22, 2020 10:32 AM
To: Chelsea J. Crawford
Cc: Andrew D. Freeman; Bill Sinclair; Neel Lalchandani
Subject: Re: Umar Burley, et al. v. BPD - Discovery Requests (Word versions)

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Good morning, Chelsea. My 2 week extension estimate has proved to be short by at least 2 days - I have been fervently working to complete the discovery responses for all of my clients, but despite my efforts, given present status, it will now not be possible to complete and serve them until this Friday, 1/24, as I certainly want to get them in your hands before the weekend. I apologize for this additional delay, but am sure it will help to avoid what otherwise would be necessary multiple

supplemental filings.

I would appreciate the indulgence of you and your fellow counsel in this regard. Thank you.

James

James H. Fields

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On Tue, Jan 7, 2020 at 4:35 PM Chelsea J. Crawford <CCrawford@browngold.com> wrote:

Hi James,

We agree to the two-week extension, and we look forward to receiving the discovery responses from your clients on or before Wednesday, January 22nd.

Thank you,

Chelsea J. Crawford

Attorney

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From: James Fields [<mailto:jfields@fieldspeterson.com>]

Sent: Tuesday, January 07, 2020 10:05 AM

To: Chelsea J. Crawford

Cc: Andrew D. Freeman; Bill Sinclair; Neel Lalchandani

Subject: Re: Umar Burley, et al. v. BPD - Discovery Requests (Word versions)

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Counsel,

I am working through the discovery responses for my clients, but I will need some additional time to complete them given anticipated unavailability issues over the holidays. I am confident that I can have all responses completed and served on or before 1/22. Accordingly, I am seeking a 2-week extension from the current due date of Jan. 8th to provide the responses.

Is this extension request acceptable to you and your clients? Thank you for your consideration.

Best,

James H. Fields

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On Tue, Dec 17, 2019 at 10:41 AM Chelsea J. Crawford <CCrawford@browngold.com> wrote:

James,

I received your voicemail message this morning. As requested, I have attached Word document versions of Umar Burley's discovery requests to your clients (Richard Willard, William Knoerlein, Michael Fries, Keith Gladstone, and Ryan Guinn).

Please let me know if you have any questions.

Thank you,

Chelsea J. Crawford

Attorney

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